

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO BE PERMITTED TO FLY
AN AIRCRAFT ON FEBRUARY 1, 2006 IN CASA GRANDE, ARIZONA**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to permit him to fly an aircraft on February 1, 2006 in Casa Grande, Arizona for approximately one (1) hour. The purpose of the flight is to take aerial photographs of the western side of Eloy for a local developer, Turn Key Homes, Inc. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from flying an aircraft.
2. Mr. Reid and undersigned counsel were before this Honorable Court on January 5, 2006 at 10:00 a.m. for oral argument on his *Motion to Modify Conditions of Release*. At that hearing, the Court ruled that Mr. Reid would not be permitted to fly an aircraft with the caveat that if Mr. Reid submitted a proper motion regarding future flights, the Court would consider it on a “piece-mail” basis.

3. Mr. Reid has the opportunity to earn money by flying an aircraft over the City of Casa Grande on February 1, 2006. Mr. Reid has received such an offer from Turn Key Homes, Inc. According to a letter from Turn Key Homes, Inc.'s President, James Wyman, the flight would "originate from the Casa Grande Airport and return to the same. The flight should take approximately one hour and will be conducted over the western side of Eloy taking pictures of real estate located in that area." A true and accurate copy of Mr. Wyman's correspondence is attached hereto as Exhibit "A."

4. Undersigned counsel has contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Jose Valencia, and Mr. Valencia stated that he has no objection to Mr. Reid flying an aircraft on February 1st.

5. Undersigned counsel has contacted his assigned Pre-trial Services Agency Office in New Mexico, Sandra Toledo, and Ms. Toledo has not yet responded as to her position regarding Mr. Reid flying an aircraft on February 1st.

6. Undersigned counsel has contacted Assistant United States Attorney James Braun and Mr. Braun has stated he has no objection to Mr. Reid flying an aircraft on February 1st.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him fly an aircraft on February 1, 2006 to fulfill an obligation with Turn Key Homes, Inc.

RESPECTFULLY SUBMITTED this 31st day of January, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
Attorney for Defendant Reid
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I hereby certify that a true and correct copy
of the foregoing was filed electronically with
the court and faxed to the Assistant United States
Attorney and mailed to the following this 31st
day of January, 2006.

/s/ electronically signed

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